

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC.; BEDFORD,
FREEMAN & WORTH PUBLISHING
GROUP, LLC D/B/A MACMILLAN
LEARNING; MACMILLAN HOLDINGS,
LLC; CENGAGE LEARNING, INC.;
ELSEVIER INC.; ELSEVIER B.V.;
MCGRAW HILL LLC; AMERICAN
ACADEMY OF PEDIATRICS; AMERICAN
HEART ASSOCIATION, INC.; AMERICAN
PSYCHIATRIC ASSOCIATION;
AMERICAN PSYCHOLOGICAL
ASSOCIATION, INC.; GUILFORD
PUBLICATIONS, INC.; HARPERCOLLINS
PUBLISHERS LLC; THE ZONDERVAN
CORPORATION LLC; JOHN WILEY AND
SONS, INC.; JONES & BARTLETT
LEARNING, LLC; NO STARCH PRESS,
INC.; PENGUIN RANDOM HOUSE LLC;
PENGUIN BOOKS LIMITED COMPANY;
SOURCEBOOKS, LLC; SIMON &
SCHUSTER, INC.; SPRINGER
PUBLISHING COMPANY, LLC; TAYLOR
& FRANCIS GROUP LLC;
W.W. NORTON & COMPANY, INC.;
LIVERIGHT PUBLISHING
CORPORATION; and
WOLTERS KLUWER HEALTH, INC.;

Plaintiffs,

v.

KHALED HASAN; NASIMA AKHTER;
ANK EXIM LLC; AURUM AMB LLC; IIZ
FORWARDING LLC; WESTPVTLLC LLC;
PRITAM SINGH, POOJA BISHT, ANKUSH
SHARMA; ANSHOO SHARMA;
PRAVEEN KUMAR SHARMA; ANINDITA
MAHANTA; MOHD KASHIF RASHID;
SAMAN NAAZ; ZYRUS ERETAIL
PRIVATE LIMITED; TWIQ EXPORT PVT
LTD; STOREMATE KART SERVICES PVT
LTD; LIFE OF RILEY PRIVATE LIMITED;

Civil Action No. 23-cv-7284-PAC

LIFE OF RILEY INTERNATIONAL INC.;
POOJA SHARMA; and DOES 1–50;

Defendants.

DECLARATION OF DANAE TINELLI

I, **Danae Tinelli**, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate at Oppenheim + Zebrak, LLP (“O+Z”), which represents Plaintiffs Pearson Education, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, Cengage Learning, Inc., Elsevier Inc., McGraw Hill LLC, American Academy of Pediatrics, American Heart Association, Inc., American Psychiatric Association, American Psychological Association, Inc., Guilford Publications, Inc., HarperCollins Publishers LLC, The Zondervan Corporation LLC, John Wiley and Sons, Inc., Jones & Bartlett Learning, LLC, No Starch Press, Inc., Penguin Random House LLC, Sourcebooks, LLC, Simon & Schuster, LLC,¹ Springer Publishing Company, LLC, Taylor & Francis Group LLC, W.W. Norton & Company, Inc., Liveright Publishing Corporation, and Wolters Kluwer Health, Inc. (collectively, “Publishers”), and Macmillan Holdings, LLC, Elsevier B.V., and Penguin Books Limited Company (collectively, with Publishers, “Plaintiffs”) in the above-captioned case.

2. I submit this declaration in support of Plaintiffs’ Motion to Amend Appendix D to the Default Judgment, Permanent Injunction, and Post-Judgment Relief Order (the “Motion”). I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. On April 25, 2024, we caused Defendants to be served with the Default Judgment,

¹ On October 30, 2023, Simon & Schuster, LLC became the successor in interest to Simon & Schuster, Inc. See Amended 7.1 Corporate Disclosure Statement, ECF No. 105.

Permanent Injunction, and Post-Judgment Relief Order dated April 22, 2024 (ECF No. 170) (the “Order”).

4. As part of Plaintiffs’ efforts to enforce the Order, we have provided the Order to third parties whose services Defendants have used to infringe, including online marketplaces, distributors who operate buyback portals, logistics companies, payment processors, and banks and issued several subpoenas pursuant to Federal Rule of Civil Procedure 69(a)(2). Based on information received in response, as well as the review of publicly available business records and subscription-based import-export records, Plaintiffs have discovered new aliases, emails, online storefronts, and companies used by Defendants to import and sell counterfeit copies of Plaintiffs’ books. This evidence shows that notwithstanding the Order, Defendants have continued to engage in counterfeiting, including by exporting from India and importing into the United States counterfeit copies of certain Publishers’ copyrighted works bearing unauthorized trademark reproductions. These new aliases, emails, online storefronts, and companies are included in Plaintiffs’ proposed Amended Appendix D to the Order (“First Amended Appendix D”) filed with the Motion.

5. Plaintiffs have discovered two new companies that Defendants identified in “Group 2” in the Order (*see* Order at 8) have used to distribute over 7,000 counterfeit copies of Publishers’ books. The first company is called Vozana Homes (OPC) Private Limited (“Vozana”). Import-export records show that Vozana made multiple shipments of books from India to LCDSWAP, LLC d/b/a ShipHype (“ShipHype”), a logistics company with a location in California. The Indian Ministry of Corporate Affairs record for Vozana lists Vrinda Sharma as a director (a true and correct copy of this record is attached hereto as Exhibit 1). Vrinda Sharma is also a director of the named Defendant Life of Riley Private Limited and is listed in Appendix D to the Default

Judgment (“Original Appendix D”) (a true and correct copy of the Indian Ministry of Corporate Affairs record for Life of Riley Private Limited, listing Vrinda Sharma as a director, is attached hereto as Exhibit 2). The second new company associated with the Group 2 Defendants is Valeo Enterprises (“Valeo”). Import-export records show that Valeo also shipped books from India to ShipHype.

6. ShipHype provided Plaintiffs with the book titles and a sample of books that Vozana and Valeo shipped to it. Plaintiffs’ inspection revealed that all the books in the sample are counterfeit.

7. Furthermore, based on information provided by ShipHype, a company called Linger Stacy LLC (“Linger Stacy”) paid ShipHype for the services that ShipHype provided to Vozana and Valeo. In responding to Plaintiffs’ subpoena, ShipHype provided copies of passports and identification cards of the individuals who made the payments, including passports for Pooja Sharma (a named Defendant) and Vrinda Sharma (discussed above) and identification cards for Praveen Kumar (who is named in Original Appendix D) and Dheeraj Kumar Sahu. Accordingly, Plaintiffs have added Vozana, Valeo, Linger Stacy, and Dheeraj Kumar Sahu to the First Amended Appendix D.

8. The information provided by ShipHype, as well as Linger Stacy’s registered agent pursuant to a subpoena, also shows that Defendants use the following names and email addresses connected to Linger Stacy, Valeo, and Vozana, which Plaintiffs have added to the First Amended Appendix D: Raghunathan Kalyanam, Deepak Deepak, backgreen39@gmail.com, opsblkgreen@gmail.com, and prkcentraldistributors@gmail.com.

9. Based on information provided by Walmart.com in responding to Plaintiffs’ subpoena, Plaintiffs have discovered additional online storefronts owned and/or operated by Group

2 Defendants. The storefront DUDKIHOMES lists as its business name Leather Ceatra (OPC) Private Limited (“Leather Ceatra”), an Indian company with directors Raghav Sharma, Ramesh Chand Sharma, and Vidushi Sharma, who, according to Indian Ministry of Corporate Affairs records, are also directors of named Defendant Life of Riley Private Limited, and who are also listed in the Original Appendix D. Attached as Exhibit 3 is a true and correct copy of the corporate record from the Indian Ministry of Corporate Affairs for Leather Ceatra. Similarly, information from Walmart.com revealed that the storefront SYM Home & Kitchen (formerly called Books Wagon Shop) uses the same address as DUDKIHOMES. Plaintiffs have added these newly identified storefronts and the following information from Walmart.com connected to those storefronts to First Amended Appendix D: Leather Ceatra (OPC) Private Limited, Gaurav Yadav, cetraleather@gmail.com, info@anantamhomes.com, and craftvaishu@gmail.com.

10. Further, based on the information provided by Walmart.com in responding to Plaintiffs’ subpoena, Plaintiffs have discovered several online storefronts on Walmart.com used by Defendants identified in “Group 1” in the Order (*see* Order at 8). One storefront is called TOPCLASS, an alias identified in the Original Appendix D. The TOPCLASS storefront lists its business name as STOREMATE KART SERVICES PVT LTD, a named Defendant, and its business address is the same address used by Defendants for the Payoneer account ending in 2192 and the PayPal accounts ending in 1305 and 9064, all of which are identified in Appendix E to the Order. Similarly, the online storefront Fortune Empire’s business name is TWIQ EXPORT PRIVATE LIMITED, which is a named Defendant in this case, and Fortune Empire’s business address is the same address used by Defendants for the PayPal account ending in 5345, which is identified in Appendix E to the Order. Moreover, the online storefront SUPERZEST’s business name is SUPERZEST SOLUTIONS, the same as an infringing storefront identified in the Original

Appendix D, and its business address is the same address used by Defendants for the Payoneer account ending in 5684, which is also identified in Appendix E to the Order. Finally, the storefronts CONNET TO ONLINE and SUPER TRADE SERVICE both share the same address as the storefront SUPERZEST. Accordingly, Plaintiffs have added these newly identified storefronts and the following information from Walmart.com connected to those storefronts to the First Amended Appendix D: Chanchal Johnston, connecttoonline3@gmail.com, and supertradeservices026@gmail.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16, 2025

/s/ Danae Tinelli
Danae Tinelli